

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
)
)
v.) No. 18 C 8524
)
)
JESSICA FLORES,)
)
)
Defendant.)

COMPLAINT

The United States of America, by John R. Lausch, Jr., United States Attorney for the Northern District of Illinois, brings this action for civil penalties for conspiracy to possess with intent to distribute and distribute a controlled substance, in violation of 21 U.S.C. § 846.

Parties

1. The plaintiff is the United States of America on behalf of Homeland Security
2. Defendant Jessica Flores ("Flores") is a domiciliary of the State of Illinois.

Factual Background

3. Beginning no later than April 2016 and continuing to on or about September 28, 2016, at Chicago, defendant Jessica Flores conspired with others to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, a quantity of a mixture and substance containing 3-4 Methyleneoxymethamphetamine ("MDMA"), a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 846.

4. Flores acknowledges that, over the course of the conspiracy, the approximate total amount of narcotics involved in the conspiracy, which was reasonably foreseeable to Flores, was approximately 12,000 MDMA pills.

5. Flores was indicted on October 5, 2016, and charged with conspiracy to possess with intent to distribute and distribute a controlled substance.

6. Defendant pled guilty on June 15, 2017, and agreed to be subject to forfeiture to the United States all right, title, and interest that she has in any property involved in the offense. See Exhibit A.

7. Defendant agreed to forfeiture of \$4,000, as identified in the forfeiture allegation of the indictment.

8. In doing so, defendant admits that the property described above was involved in the offense, as alleged in the indictment. Defendant consents to the immediate entry of a preliminary order of forfeiture as to this specific property, thereby extinguishing any right, title, or interest defendant has in it.

9. Defendant understands that forfeiture shall not be treated as satisfaction of any fine, cost of imprisonment, or any other penalty the Court may impose upon defendant in addition to the forfeiture judgment.

10. Paragraph No. 14 of the Plea Agreement states that defendant agrees to participate in the Sentencing Options That Achieve Results (SOAR) program, pursuant to the terms set forth in the SOAR Contract for Participation attached as Exhibit A.

11. Also, Flores has agreed to the entry of a Civil Consent Judgment in the amount of \$4,000, which represents the amount owed to the United States, as the result of her actions.

Claim For Relief

WHEREFORE, the United States demands judgment against the defendant in the amount of \$4,000, and any such further relief as the court deems appropriate.

Respectfully submitted,

JOHN R. LAUSCH, Jr.
United States Attorney

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